

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

HEWLETT-PACKARD COMPANY,
and HEWLETT-PACKARD
DEVELOPMENT COMPANY, L.P.,

Plaintiffs,

v.

ICL NETWORK SOLUTIONS
(HK) LIMITED,

Defendant.

Civil Action No.: 05-cv-40153 (FDS)

**DEFENDANT'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

ICL Network Solutions (HK) Limited ("ICL Network Solutions") hereby moves to dismiss all claims of Hewlett-Packard Company and Hewlett-Packard Development Company, L.P. ("Hewlett-Packard"), for lack of personal jurisdiction.

In support, ICL Network Solutions states:

1. On September 1, 2005, Hewlett-Packard brought the instant case alleging trademark counterfeiting, trademark infringement, false designation of origin, common law unfair competition and violation of Massachusetts Unfair Practices (Mass. Gen. Law C. 93A) in relation to Hewlett-Packard's federally registered trademarks.
2. As detailed in the accompanying Memorandum, ICL Network Solutions is a Hong Kong corporation that lacks sufficient contacts with Massachusetts (or any other state) to permit the Court's exercise of jurisdiction over it.

WHEREFORE defendant ICL Network Solutions requests that its Motion to Dismiss for Lack of Personal Jurisdiction be GRANTED.

Respectfully submitted,

Dated: September 22, 2005

/s/ Emily A. Berger
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion to Dismiss for Lack of Personal Jurisdiction was served upon counsel listed below by electronically filing with the Court on September 22, 2005.

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